

Public Comments on Noncommercial Educational Station Fundraising for Third-Party Non-Profit Organizations:=====

Title: Noncommercial Educational Station Fundraising for Third-Party Non-Profit Organizations

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Comment: I agree with the goals of the proposed rule. However, various conflicts and issues may be resolved by clarification of and limits to the waivers granting third-party fundraising programming. Section 399B of the Communications Act of 1934 claims that NCE broadcast stations retain their noncommercial and educational nature by prohibiting fundraising activities that do not directly benefit the NCE station. Yet, the Information Needs of Communities Report (INC Report), a 2011 report on the media landscape, suggested that noncommercial broadcasters need more flexibility in how they serve their local communities and should be unburdened of regulations that hinder their abilities to meet their religious or civic mission. By permitting only the broadcast of local organizations' fundraisers which are in line with NCE stations' mission to serve their community, the noncommercial and educational nature of NCE stations would be preserved. These fundraisers could serve as an educational tool by informing viewers of issues taking place in their community. The rule should also state that NCE stations must produce the fundraising programming rather than simply airing the third-party's programs. Also, clarification is required as to what "remuneration" means, in regards to Section 399B of the

Communications Act of 1934, which bans programming promoting social interests in exchange for it. An interpretive rule might be added that defines remunerations as profit. In this case it would be funds above the cost NCE stations incur in producing third-party fundraiser programming. This would preserve the noncommercial nature of NCE stations. Finally, the one percent limit on maximum third-party fundraising airtime is crucial. According to the FCC this amounts to about 88 hours per year on average, a reasonable amount of maximum airtime. With this limit NCE stations will not be overrun by fundraiser programming and deter viewers.

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